# IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA

# TR' Kelvin Cornelius Thomas TR (Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs

this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

# 3 Different Contract Companys Horry County Police Department

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

# Complaint for a Civil Case

Case No		
(to be filled i	n by the Cl	erk's Office)
Jury Trial:	☐ Yes	

## I. The Parties to This Complaint

4:25-cv-00206-JD-TER

# A. The Plaintiff(s)

Provide the information below	w for each plaintiff named in the complaint. Attach
additional pages if needed.	
Name	JR' Kelvin Cornelius Thomas JR 145 Dave Carr Ct.
Street Address	145 Dave Carr Ct.
City and County	Murtle Beach
State and Zip Code	South Caroling 29588
Telephone Number	843 - <i>360 - 4053</i>

# B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1	_
Name	Horry County Police Department
Job or Title	Horry County Police Department
(if known)	
Street Address	
City and County	MyrtleBeach - Horry County
State and Zip Code	South Carolina 29588
Telephone Number	843 - 911
Defendant No. 2	
Name	3 Different Contract companys
Job or Title	Contract Companys
(if known)	4 /
Street Address	
City and County	
State and Zip Code	South Carolina
Telephone Number	
Defendant No. 3	
Name	Daminou Vitaly

4:25-cv-00206-JD-TER

II.

	Job or Title	Contract Company
	(if known)	
	Street Address	
	City and County	
	State and Zip Code	South Carolina
	Telephone Number	
Ι	Defendant No. 4	
	Name	
	Job or Title	
	(if known)	
	Street Address	
	City and County	
	State and Zip Code	
	Telephone Number	
Basis fo	r Jurisdiction	
under the Under 25 State or	e United States Constitution 8 U.S.C. § 1332, a case in wantion and the amount at state a diversity of citizenship case.	the parties. Under 28 U.S.C. § 1331, a case arising or federal laws or treaties is a federal question case. hich a citizen of one State sues a citizen of another ke is more than \$75,000 is a diversity of citizenship se, no defendant may be a citizen of the same State
What is	the basis for federal court ju	risdiction? (check all that apply)
	Federal question	Diversity of citizenship
Fill out 1	he paragraphs in this section	that apply to this case.
A. I	f the Basis for Jurisdiction	Is a Federal Question
	ist the specific federal statustates Constitution that are a	tes, federal treaties, and/or provisions of the United tissue in this case.
	page sent Constitut	ion Rights of South Carolina
_	1	<i>y</i>
_		

Entry Number 1

#### B. If the Basis for Jurisdiction Is Diversity of Citizenship

1.	The P	Plaintiff(s)
	a.	If the plaintiff is an individual
		The plaintiff, (name) & hour langues home &, is a citizen of the State of (name) South Carolina
	b.	If the plaintiff is a corporation
		The plaintiff, (name), is incorporated under the laws of the State of (name), and has its principal place of business in the State of (name)
		ore than one plaintiff is named in the complaint, attach an additional providing the same information for each additional plaintiff.)
2.	The D	Defendant(s)
	a.	If the defendant is an individual
		The defendant, (name) <u>Naminov Vitaly</u> , is a citizen of the State of (name) <u>South Carolina</u> . Or is a citizen of (foreign nation)
	b.	If the defendant is a corporation
		The defendant, (name) <u>Daminov Vitaly</u> , is incorporated under the laws of the State of (name) <u>South Carolina</u> , and has its principal place of business in the State of (name) <u>South Carolina</u> . Or is incorporated under the laws of (foreign nation) , and has its principal place of business in (name) <u>Con tract Company</u> .
	additt	ore than one defendant is named in the complaint, attach an ional page providing the same information for each additional dant.)

#### 3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

Entry Number 1

and run's with my water need fixing. The

#### III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

additional pages sent already

#### IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

nolonger able to work and don't have to

## V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

### A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where caserelated papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

	address on the with the clerk's office may result in the distinction of my case.	
	Date of signing: 1/03, 2025  Signature of Plaintiff  (m. kelerin (ornalis) homes) (m. kelerin (ornalis) homes)	
	Printed Name of Plaintiff 'R' Kelvin Cornellus /homas Il	_
B.	For Attorneys	
	D 4 - C 1 - 1	
	Date of signing:, 20	
	Signature of Attorney	
	Printed Name of Attorney David Ashley	
	Bar Number	
	Name of Law Firm	
	Address	
	Telephone Number	
	E-mail Address	